

DANIEL G. BOGDEN
United States Attorney
District of Nevada

JUSTIN E. PINGEL
Assistant United States Attorney
Nevada State Bar No. 10186
333 Las Vegas Boulevard South, Suite 5000
Las Vegas, Nevada 89101
Telephone: 702-388-6336
Facsimile: 702-388-6787
Email: justin.pingel@usdoj.gov

Attorneys for the United States.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

BRADLEY SMITH,)	
)	
Plaintiff,)	Case No: 2:13-cv-00892-GMN-PAL
)	
v.)	
)	
NESTOR LOPEZ, REGINALD WINBUSH,)	
GEORGE J. OPFER, STEVE STERN, GWEN)	
SHOCKLEY,)	
)	
Defendants.)	

UNOPPOSED MOTION FOR EXTENSION OF TIME
(First Request)

The Federal Defendant United States of America, by and through Daniel G. Bogden, United States Attorney, and Justin E. Pingel, Assistant United States Attorney for the District of Nevada, respectfully requests an extension of time for the Federal Defendant to reply to the Plaintiff's Opposition to Defendant(s) Motion to Dismiss (ECF #12) until on or before October 18, 2013.

1 In support of the instant Motion, the Federal Defendant submits the following:

2 1. This Motion is brought in order to accommodate the undersigned counsel for the
3 United States.

4 2. On August 30, 2013, the Federal Defendant filed a Motion to Dismiss (ECF #10).
5 The Plaintiff filed his opposition on September 12, 2013.

6 3. The requested extension of time is necessary in order for government counsel to
7 properly reply to the opposition. Over the past several months, government counsel has been
8 heavily involved in ongoing hearings, discovery and depositions, and has multiple deadlines due
9 within the next few weeks. *Teixeira v. United States, et al.* (2:11-cv-02022-JCM-NJK); *Garity v.*
10 *United States Postal Service* (2:11-cv-01805-MMD-CWH); *Shannon Bradley, et al. v. United*
11 *States*, (2:12-cv-01526-APG-GWF), and others.

12 4 Plaintiff does not oppose this request for extension of time.

13 5. The instant motion is filed in good faith and not for the purposes of delay.

14 WHEREFORE, for the above reasons, Federal Defendant respectfully requests the instant
15 Motion extending time to reply until on or before October 18, 2013, be granted.

16 Respectfully submitted this 24th day of September 2013.

17 DANIEL G. BOGDEN
18 United States Attorney

19 /s/Justin Pingel
20 JUSTIN E. PINGEL
21 Assistant United States Attorney

22 IT IS SO ORDERED:

23 
24 _____
25 Gloria M. Navarro
26 United States District Judge

DATED: 09/25/2013